

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:)	
)	Chapter 11
GWG Holdings, Inc., <i>et al.</i> , ¹)	
)	Case No. 22-90032 (MI)
Debtors.)	
)	Jointly Administered
)	

**MAYER BROWN LLP’S, FTI CONSULTING INC.’S, PJT PARTNERS LP’S, AND
ERNST & YOUNG LLP’S FURTHER AMENDED JOINT WITNESS AND EXHIBIT
LIST FOR HEARING SCHEDULED FOR OCTOBER 27, 2023 AT 9:30 A.M.
(PREVAILING CENTRAL TIME)**

Mayer Brown LLP (“Mayer Brown”), FTI Consulting, Inc. (“FTI”), PJT Partners LP (“PJT”), and Ernst & Young LLP (“EY”) file their further amended Joint Witness and Exhibit List for the hearing to be held on October 27, 2023, at 9:30 a.m. (prevailing Central Time) as follows:

WITNESSES

Mayer Brown, FTI, PJT, and/or EY may call the following witnesses at the hearing:

1. Thomas S. Kiriakos, Partner at Mayer Brown LLP, Lead Counsel for the Debtors and Debtors in Possession;
2. Michael A. Tucker, Interim Chief Financial Officer of GWG Holdings, Inc.;
3. Peter Laurinaitis, Partner at PJT Partners, investment bank to the Debtors and Debtors in Possession;
4. William Nolan, FTI Consulting, Inc., as financial advisor to the Debtors;

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538); GWG DLP Funding IV, LLC (2589); GWG DLP Funding VI, LLC (none); and GWG Funding Holdings VI, LLC (none). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ claims and noticing agent: <https://donlinrecano.com/gwg>.

5. Chas Harvick, FTI Consulting, Inc., as financial advisor to the Debtors;
6. Richard Fung, Ernst & Young LLP, as tax services provider to the Debtors;
7. Any witness listed or called by any other party;
8. Rebuttal witnesses as necessary; and
9. Mayer Brown, FTI, PJT, and EY reserve the right to cross-examine any witness called by any other party.

EXHIBITS

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
1.	Declaration of Thomas S. Kiriakos in Support of Mayer Brown LLP's Fifth Interim and Final Fee Application for Allowance and Payment of Fees and Expenses as Counsel to the Debtors for the Period from April 20, 2022 Through June 20, 2023 [Dkt. No. 2144, Ex. A]						
2.	Supplemental Declaration of Thomas S. Kiriakos in Support of Mayer Brown LLP's Fifth Interim and Final Fee Application for Allowance and Payment of Fees and Expenses as Counsel to the Debtors for the Period from April 20, 2022 Through June 20, 2023 [Dkt. No. 2248]						
3.	Declaration of Michael A. Tucker in Support of Mayer Brown LLP's Fifth Interim and Final Fee Application for Allowance and Payment of Fees and Expenses as Counsel to the Debtors for the Period from April 20, 2022 Through June 20, 2023 [Dkt. No. 2253]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
4.	Declaration of Thomas S. Kiriakos in Support of the Debtors' Application for Entry of an Order (I) Authorizing the Retention and Employment of Mayer Brown LLP as Attorneys for the Debtors and Debtors In Possession and (II) Granting Related Relief [Dkt. No. 222-1]						
5.	Supplemental Declaration of Thomas S. Kiriakos in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Mayer Brown LLP as Attorneys for the Debtors and Debtors In Possession [Dkt. No. 340]						
6.	Second Supplemental Declaration of Thomas S. Kiriakos in Support of the Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Mayer Brown LLP as Attorneys for the Debtors and Debtors In Possession [Dkt. No. 1091]						
7.	Order Authorizing (I) the Retention and Employment of Mayer Brown LLP as Attorneys for the Debtors and Debtors in Possession and (II) Granting Related Relief [Dkt. No. 369]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
8.	Engagement letter between Debtors and Mayer Brown, dated January 11, 2022, and thereafter supplemented by further letter agreement, dated April 4, 2022 [Dkt. No. 369, Ex. 1]						
9.	Mayer Brown's Voluntary Rate Disclosures [Dkt. No. 2144, Ex. D]						
10.	Mayer Brown's Summary of Total Fees Incurred and Hours Billed During the Fee Period [Dkt. No. 2144, Ex. E]						
11.	Mayer Brown's Summary of Actual and Necessary Expenses for the Fee Period [Dkt. No. 2144, Ex. F]						
12.	Mayer Brown's Records of Time Expended Providing Services During the Fee Period [Dkt. No. 2144, Ex. G]						
13.	Mayer Brown's Records of Expenses Incurred During the Fee Period [Dkt. No. 2144, Ex. H]						
14.	Transcript of Emergency Motion Hearing Held on December 1, 2022 [Dkt. No. 1160]						
15.	Transcript of Confirmation Hearing held on June 15, 2023 [Dkt. No. 2010]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
16.	Declaration of Peter Laurinaitis in Support of Fifth Interim and Final Fee Application of PJT Partners LP as Investment Banker for the Debtors for Allowance (and Final Approval) of Compensation for Services Rendered and Reimbursement of Out-Of-Pocket Expenses Incurred from the Period of April 20, 2022 Through June 20, 2023 [Dkt. No. 2252]						
17.	Order (I) Authorizing the Retention and Employment of PJT Partners LP as Investment Banker for the Debtors and Debtors in Possession, (II) Waiving Certain Time Keeping Requirements, and (III) Granting Related Relief (including exhibits thereto) [Dkt. No. 416]						
18.	Fifth Interim and Final Fee Application of PJT Partners LP as Investment Banker for the Debtors for Allowance (and Final Approval) of Compensation for Services Rendered and Reimbursement of Out-Of-Pocket Expenses Incurred from the Period of April 20, 2022 Through June 20, 2023 (including exhibits thereto) [Dkt. No. 2137]						
19.	Order (I) Authorizing the Employment and Retention of FTI Consulting, Inc. as Financial Advisor to the Debtors and (II) Granting Related Relief [Dkt. No. 377]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
20.	FTI Consulting Inc.'s Fourth Interim and Final Fee Application for Allowance and Payment of Fees and Expenses as Financial Advisor to the Debtors for the Period from April 20, 2022 Through June 20, 2023 (including exhibits thereto) [Dkt. No. 2136]						
21.	Debtors' Motion for Entry of an Order Confirming Expansion of Engagement of FTI Consulting, Inc. and Designation of Michael A. Tucker as Interim Chief Financial Officer, and Granting Related Relief (including exhibits thereto) [Dkt. No. 1273]						
22.	Order Approving Expansion of Engagement of FTI Consulting, Inc. and Designation of Michael A. Tucker as Interim Chief Financial Officer, and Granting Related Relief [Dkt. No. 1353]						
23.	Declaration of Chas E. Harvick in Support of FTI's Fourth Interim and Final Fee Application for Allowance and Payment of Fees and Expenses as Financial Advisor to the Debtors for the Period from April 20, 2022 Through June 20, 2023 [Dkt. No. 2251]						

EXHIBIT	DESCRIPTION	MARK	OFFER	OBJECT	ADMIT	W/D	DISPOSITION AFTER TRIAL
24.	Order (I) Authorizing the Employment and Retention of Ernst & Young LLP as Tax Services Provider to the Debtors and (II) Granting Related Relief [Dkt. No. 1217]						
25.	Third Interim and Final Fee Application of Ernst & Young LLP for Compensation and Reimbursement of Expenses as Tax Services Provider to the Debtor for the Fee Period from April 20, 2022 Through June 20, 2023 (including exhibits thereto) [Dkt. No. 2130]						
	Any document or pleading filed in the above-captioned main cases, including any exhibits thereto						
	Any exhibit necessary for impeachment and/or rebuttal purposes						
	Any exhibit identified or offered by any other party						

REQUESTS FOR JUDICIAL NOTICE

Additionally, FTI, PJT, EY, and/or Mayer Brown may request that the Court take judicial notice of the record in the above-captioned chapter 11 cases, including, without limitation, the Debtors' plan and disclosure statement filings [including Dkt. Nos. 1134, 1135, 1421, 1422, 1563, 1564, 1581, 1583, 1584, 1645, 1651, 1661, 1662, 1663, 1676, 1677, 1678, 1682, 1695, 1698, 1815, 1926], the Court's plan confirmation order [Dkt. No. 1952], the Debtors' filings in connection with

plan mediation [including Dkt. No. 1518], the Debtors' filings in connection with post-petition financing provided by an affiliate of Vida Capital, Inc. [including Dkt. Nos. 821, 920, and 945], and any other documents of record in such chapter 11 cases that may be relevant in connection with the aforementioned hearing.

RESERVATION OF RIGHTS

Mayer Brown, FTI, PJT, and EY reserve the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserve the right to supplement this list prior to the hearing.

Houston, Texas
October 27, 2023

/s/ Kristhy M. Peguero

JACKSON WALKER LLP

Matthew D. Cavanaugh (TX Bar No. 24062656)
Kristhy M. Peguero (TX Bar No. 24102776)
1401 McKinney Street, Suite 1900
Houston, Texas 77010
Telephone: (713) 752-4200
Email: kpeguero@jw.com
Email: mcavanaugh@jw.com

MAYER BROWN LLP

Charles S. Kelley (TX Bar No. 11199580)
700 Louisiana Street, Suite 2400
Houston, TX 77002-2730
Telephone: (713) 238-3000
Email: ckelley@mayerbrown.com

-- and --

Thomas S. Kiriakos (admitted *pro hac vice*)
Louis S. Chiappetta (admitted *pro hac vice*)
71 S. Wacker Drive
Chicago, IL 60606
Telephone: (312) 701-0600
Email: tkiriakos@mayerbrown.com
Email: lchiappetta@mayerbrown.com

-- and --

Adam C. Paul (admitted *pro hac vice*)
Lucy F. Kweskin (admitted *pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020-1001
Telephone: (212) 506-2500
Email: apaul@mayerbrown.com
Email: lkweskin@mayerbrown.com

Certificate of Service

I certify that on October 27, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Kristhy M. Peguero

Kristhy M. Peguero